



**THE EDWIN F. MANDEL LEGAL AID CLINIC
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July 26, 2005

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Via Facsimile

Re: Bond v. Utreras, et. al. No. 04 C 2617

Dear Counsel:

After comparing the Employee Complaint Histories ("indices") with the complaint registers that you produced, we found that a significant number of complaint registers were not disclosed. As these complaint register files pertain to the individual police defendants whom we are seeking to depose, please produce the files listed below before the end of this week.

- a) 255289
- b) 265893
- c) 265804
- d) 261514
- e) 276011
- f) 293008
- g) 291990
- h) 273527
- i) 261514
- j) 262498
- k) 262974

In addition, we found that relevant information was redacted on three of the complaint registers, including the name and contact information of the complainants, witnesses, and victims, along with certain details about the incidents. Please produce unredacted copies of the complaint registers listed below.


- a) 286656

- b) 274757
- c) 285883

We also believe that complaint register 287008 is incomplete because the To-From Reports from Officers Utreras, Seinitz, and Snelling were omitted. Please turn over these documents before the end of the week.

Furthermore, we are concerned that the indices of complaints against the individual defendants are incomplete. As a result of work unrelated to this case, we are aware that Harold Hall, an attorney in the Cook County Public Defender's Office, filed a complaint against Defendant Utreras for threatening him in open court. The complaint register number is 301006. (A copy of Mr. Hall's statement was mailed to you today under separate cover.) It concerns us that this complaint was not even listed in the index that you provided, much less produced in full. Why is Mr. Hall's complaint register not listed on Utreras' Employee Complaint History? In addition, complaint register 287008, a complaint that you produced related to Defendant Stegmiller, also accused Defendant Utreras of abusive conduct. This complaint is also absent from Utreras' Employee Complaint History. Based on the limited information that we know by mere happenstance, we are concerned that other abuse complaints against the individual defendants are missing from the indices. How were the Employee Complaint Histories generated? What will you do to assure us that Employee Complaint Histories for all of the individual defendants will be made complete?

Sincerely,

A handwritten signature in cursive script that reads "Melanie Miles".

Melanie Miles
Law Student